



SDMS DocID

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Cira Centre  
2929 Arch Street  
Philadelphia, PA 19104-2808  
+1 215 994 4000 Main  
+1 215 994 2222 Fax  
www.dechert.com

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**MICHAEL A. BOGDONOFF**

michael.bogdonoff@dechert.com  
+1 215 994 2891 Direct  
+1 215 655 2891 Fax

January 23, 2006

**VIA E-MAIL**

Harry R. Steinmetz (3HS62)  
U.S. Environmental Protection Agency, Region 3  
1650 Arch Street  
Philadelphia, PA 19103-2029

Re: Safety Light Corporation Site  
Bloomsburg, Pennsylvania

Dear Mr. Steinmetz:

This letter is submitted on behalf of VF Intimates, LP, a Delaware limited partnership and successor-by-merger to Vanity Fair Mills, Inc., an Alabama corporation ("VFM") in response to the United States Environmental Protection Agency ("EPA") request for information pursuant to CERCLA § 104(e) in the above matter. By agreement, the deadline for such response was extended to January 23, 2006.

EPA's information request has attached thereto a document described as a site record and EPA states that such document "suggest[s] that a business arrangement existed between Safety Light Corporation and VFM". VFM has no knowledge, information or documents related to that purported site record.

The following responds to the specific numbered requests for information:

**INFORMATION REQUESTED**

1. Describe in detail the business relationship between VFM and Safety Light.

**VFM Response:** VFM operated several facilities in Alabama at which emergency exit signs manufactured by Safety Light Corporation were apparently installed. Some of these facilities are in active operation, while others are now under the control of other entities. Documents regarding such emergency exit signs are attached hereto.

2. Did VFM ever transport and/or broker hazardous substances and/or radioactive waste or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite to the Site?

**VFM Response:** VFM has no knowledge, information or documents regarding any transport and/or brokering of hazardous substances and/or radioactive waste or other wastes that were allegedly disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite to the Site.

3. If you answered "yes" to Question 2, please answer the following questions:

**VFM Response:** Not Applicable.

- a. Provide the name, current address (or most recent address available), telephone number, and contact person for each customer/generator/transporter for which you transported/brokered hazardous substances, radioactive waste or other wastes.
- b. Provide the time period during which you transported/brokered each customer/generator/transporter's hazardous substances, radioactive waste or other wastes.
- c. For each customer/generator/transporter for which you transported/brokered hazardous substances, radioactive waste or other wastes, provide:
  - i. the entity which received the hazardous substances, radioactive waste or other wastes (i.e., U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, Isolite);
  - ii. the type of hazardous substances, radioactive waste or other wastes that was disposed/reclaimed;
  - iii. the amount of hazardous substances, radioactive waste or other wastes transported/brokered to the Site by you;

- iv. the dates of the pickup/delivery of the hazardous substances, radioactive waste or other wastes;
  - v. all personal and internal company documents and correspondence regarding the type and amount of hazardous substances, radioactive waste or other wastes, dates transported/brokered to the Site, and transactions with U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite;
  - vi. the name, title, areas of responsibility, current (or most recent) addresses, and telephone numbers of other parties that have documentation or information pertaining to the transportation/disposal of hazardous substances, radioactive waste or other wastes at the Site.
4. Did VFM ever generate radioactive wastes or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite at the Site?

**VFM Response:** VFM has no knowledge, information or documents regarding any radioactive wastes or other wastes that were allegedly disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite at the Site.

5. If you answered "yes" to Question 4, please address the following issues:

**VFM Response:** Not Applicable

- a. Please provide the following information regarding all wastes and by-products produced by your company during the period 1945 to the present:
  - i. the nature of radioactive waste or other wastes, hazardous substances, and/or by-products used, including their chemical content, characteristics, and physical state (i.e., liquid, solid, gas, or in the form of contaminated rags, cups, containers). Provide chemical analyses and Material Safety Data Sheets ("MSDSs"). If these analyses are not available for the period 1977-1991, submit

- analyses for the time period closest to these dates and describe, in detail, any changes in the process(es) in which radioactive waste or other wastes were produced that would affect the chemical analyses;
- ii. the annual quantity of radioactive waste or other wastes, hazardous substances, and/or by-products used or generated;
- iii. the process (es) in which radioactive waste or other wastes, hazardous substances, and/or by-products were used or the process(es) that generated each;
- iv. the types of containers used to treat, store, or dispose of radioactive waste or other wastes, hazardous substances, and/or by-products; and
- v. the method of treatment and/or disposal of the above.
- b. Provide the names, titles, areas of responsibility, addresses, and telephone numbers of all persons, including you, who, during the period 1945 to the present, may have:
  - i. disposed of or treated radioactive or hazardous materials at the Site;
  - ii. arranged for the disposal or treatment of radioactive or hazardous materials at the Site; and
  - iii. arranged for the transportation of radioactive or hazardous materials to the Site (either directly or through transshipment points) for disposal or treatment.
- c. If your response to the above includes the contracting of a hauler or transporter to transport and/or dispose of wastes, explain these arrangements and provide documentation confirming the nature of those transactions. Please identify:

- i. the persons with whom you, or other such persons, made such arrangements;
  - ii. every date on which such arrangements took place;
  - iii. for each transaction, the nature and quantity of material, including its chemical content characteristics, physical state (i.e., liquid, solid), and the process for which the substance was used or the process that generated the substance;
  - iv. the precise locations at which each material was disposed or treated at the Site;
  - v. the persons who selected the Site as the place at which materials were disposed or treated;
  - vi. the final disposition of each material involved in such transactions; and
  - vii. the names of employees, officers, owners, and agents for each transporter.
- d. For each and every instance in which you/your company arranged for disposal or treatment of material at the Site, identify:
- i. the quantity (number of loads, gallons, drums) of materials that were used, treated, transported, disposed, or otherwise handled by you; and
  - ii. any billing information and documents (invoices, trip tickets, manifests) in your possession regarding arrangements made with your company to generate, treat, store, transport, or dispose of materials at the Site.
- e. Provide the names, titles, and areas of responsibility of any persons, including all VFM employees, present and former, who are knowledgeable of the waste disposal practices of your company during the

period 1945 to the present. Include current addresses and dates of birth for former employees.

- f. Describe any permits or applications and any correspondence between VFM and any regulatory agencies regarding materials transported to or disposed of at the Site.
  - g. Provide copies of any correspondence between VFM and any third party regarding materials transported or disposed of at the Site.
  - h. Provide the identity of, and copies of any documents relating to, any other person who generated, treated, stored, transported, or disposed, or who arranged for the treatment, storage, disposal, or transportation of such materials to the Site.
  - i. Provide the identities of all predecessors-in-interest who, during the period 1945 to the present, transported to or stored, treated, or otherwise disposed of any materials at the Site and describe in detail the nature of your predecessor-in-interest's business.
  - j. Provide the name, title, address, and telephone number of the person answering these questions on behalf of the respondent.
  - k. For each question, provide the name, title, area of responsibility, current address, and telephone number of all persons consulted in preparation of the answers, or who supplied documents reviewed or relied upon in the course of preparing your answers.
6. If you have reason to believe there may be persons able to provide more detailed or complete responses to any question contained herein, or who may be able to provide additional responsive documents, provide the names, titles, areas of responsibility, current addresses, and telephone numbers of such persons as well as additional information or documents they may have.

**VFM Response:** VFM has no knowledge of other persons able to provide more detailed or complete responses to any question contained herein, or who may be able to provide additional responsive documents.

7. For each and every question contained herein, if information or documents responsive to this Information Request are not in your possession, custody, or control, then provide the names, titles, areas of responsibility, current addresses, and telephone numbers of the persons from whom such information or documents may be obtained.

**VFM Response:** Not applicable

8. If you have any other information about other party(ies) who may have information that may assist the Agency in its investigation of the Site, or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the party's name, address, type of business, and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.

**VFM Response:** VFM has no other information about other party(ies) who may have information that may assist the Agency in its investigation of the Site, or who may be responsible for the generation of, transportation to, or release of alleged contamination at the Site.

9. If any of the documents solicited in this Information Request are no longer available, please indicate the reason why they are no longer available. If pertinent records or documents were destroyed or are missing, provide us with the following:

**VFM Response:** VFM has no knowledge or information about any documents solicited in this Information Request that are no longer available.

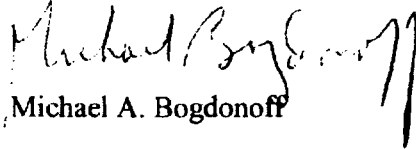
- a. Your document retention policy;
- b. A description of how the records were destroyed (burned, archived, trashed, etc.) and the approximate date of destruction;
- c. A description of the type of information that would have been contained in the documents; and



- d. The name, job title and most current address known by you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.

Please contact me if you have any questions regarding this response.

Very truly yours,

A handwritten signature in black ink, appearing to read "Michael A. Bogdonoff", with a stylized flourish at the end.

Michael A. Bogdonoff

MAB/drv



Claude Earl Fox, M.D., M.P.H.  
State Health Officer

State of Alabama  
Department of Public Health

State Office Building  
Montgomery, Alabama



MAILING ADDRESS  
434 Monroe Street Room 510  
Montgomery, Alabama 36130-1701

September 1, 1988

Mr. Roy Bayles  
Maintenance Department  
Vanity Fair Mall  
624 South Alabama Avenue  
Monroeville, Alabama 36462

Re: General Licensed Radio-  
active Devices

Dear Mr. Bayles:

According to our information, you recently received a general licensed radioactive device distributed by Safety Light Corporation. 420-3-26-.02(7)(b)3.(x) of Chapter 420-3-26, Radiation Control, Alabama Administrative Code, requires that each person who owns, receives, acquires, possesses or uses such a device shall notify this Agency of the type of device and the name and address of the supplier within ten (10) days of receipt of such device. Our records indicate that we are yet to receive your notification. Please submit the required information as soon as possible. For your convenience we have enclosed registration forms.

If this letter was not addressed to and received by the person to be responsible for the regulatory requirements of the radioactive device, please forward this material to the person who will perform such duties.

Enclosed is a copy of 420-3-26-.02(7)(b) of Chapter 420-3-26, Radiation Control, Alabama Administrative Code. This section, together with the statements on the label on the device, constitute the regulatory requirements on this general licensed radioactive device.

Random inspections of selected general licensees are performed by this Agency. To facilitate compliance during such inspections, please establish a file containing the required records such as records of receipt and transfer of devices and results of tests for leakage and/or contamination performed on your general licensed device.

Mr. Roy Bayles  
Page 2  
September 1, 1988

Should you have any questions concerning these requirements, please contact this office and we will be glad to discuss them with you.

Sincerely,

Aubrey V. Godwin, Director  
Radiological Health Branch  
Division of Environmental Health

AVG/JLM/mwf

Enclosure



Claude Earl Fox, M.D., M.P.H.  
State Health Officer

State of Alabama  
Department of Public Health

State Office Building  
Montgomery, Alabama



MAILING ADDRESS  
434 Monroe Street Room 510  
Montgomery, Alabama 36130-1701

February 3, 1989

Maintenance Department  
Vanity Fair Mills  
624 South Alabama Avenue  
Monroeville, Alabama 36462

Re: General Licensed Radio-  
active Devices

Dear Sir:

According to our information, you recently received a general licensed radioactive device distributed by Safety Light. 420-3-26-.02(7)(b)3.(x) of Chapter 420-3-26, Radiation Control, Alabama Administrative Code, requires that each person who owns, receives, acquires, possesses or uses such a device shall notify this Agency of the type of device and the name and address of the supplier within ten (10) days of receipt of such device. Our records indicate that we are yet to receive your notification. Please submit the required information as soon as possible. For your convenience we have enclosed registration forms.

If this letter was not addressed to and received by the person to be responsible for the regulatory requirements of the radioactive device, please forward this material to the person who will perform such duties.

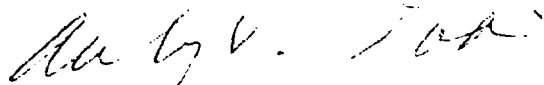
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Random inspections of selected general licensees are performed by this Agency. To facilitate compliance during such inspections, please establish a file containing the required records such as records of receipt and transfer of devices and results of tests for leakage and/or contamination performed on your general licensed device.

Maintenance Department  
Page 2  
February 3, 1989

Should you have any questions concerning these requirements, please contact this office and we will be glad to discuss them with you.

Sincerely,

A handwritten signature in cursive script, appearing to read "Aubrey V. Godwin".

Aubrey V. Godwin, Director  
Radiological Health Branch  
Division of Environmental Health

AVG/JLM/mwf

Enclosure



**Saves Lives**

## Cost Comparison

Standard AC Electrical Sign    AC/DC Battery Sign    Isolite®

### Initial Cost:

Fixture Cost	\$ 24.	\$ 115.	
Installation Labor & Materials	\$ 192.	\$ 114.	

### 10 Year Maintenance Costs:

Energy @ 10¢/kwh	\$ 698.	\$ 698.	\$0
Energy @ 15¢/kwh	\$1047.	\$1047.	\$0
Lamp Replacement Labor	\$ 34.	\$ 23.	\$0
Lamp Replacement Labor	\$ 150.	\$ 100.	\$0
Battery Maintenance	—	\$ 75.	\$0

### Total 10 Year Cost:

@ 10¢/kwh	\$1098.	\$1125.	
@ 15¢/kwh	\$1447.	\$1474.	

**... For Those Who Wish To Take The Bite Out Of High Energy Costs ...**

## Isolite . . . Modern, Safe, Reliable

ISOLITE self-illuminating exit signs provide continuous identification of building exits. ISOLITE exit signs do not utilize batteries or electricity. Electrical wiring, electrical power, lamp replacement, and maintenance are not required. ISOLITE is the lowest exit sign system in overall cost to own and operate. Because there is nothing to go wrong, they are the most reliable means of exit lighting.

The heart of the ISOLITE self-illuminating exit sign is its hermetically sealed tritium activated light tube. Each light tube is manufactured from tough pyrex glass and is internally coated with phosphor which is excited to luminesce by the low level Beta radiation of tritium gas. Due to the low energy level of Beta radiation within the light tube, there is no measurable radiation outside the sign.

The light tubes are enclosed behind translucent plastic to produce even light dispersal over the surface of each legend. The half-life of tritium is 12.46 years. Replacement every 10 to 15 years is recommended.

ISOLITE exit signs are manufactured by Safety Light Corporation under stringent quality control procedures and meet all requirements of the Federal Nuclear Regulatory Commission. They have undergone rigorous testing, including thermal shock, temperature, resonant cycling vibration, reduced pressure, penetration, and free gravitational fall to an unyielding surface.

## Ideal for Hazardous Environments

ISOLITE signs are absolutely sparkfree, vibration and dust proof, and unaffected by moisture, pressure and temperature changes. The well engineered design makes the ISOLITE exit sign the logical choice in hazardous environments which threaten the dependability and shorten the life of standard fixtures.

## ... New Energy ... Saves Lives.

- Licensed by U.S. Nuclear Regulatory Commission
- UL Listing #296S
- Meets 1981 NFPA Life Safety Code 101
- Complies with O.S.H.A. Requirements
- Accepted by Mine, Safety & Health Administration (MSHA)
- Listed by Building Officials & Code Administrators (BOCA)
- International Conference of Building Officials (ICBO); and
- Southern Building Code Conference International (SBCCI)
- Various Other State and Local Fire Marshal Acceptances

ISOLITE signs are always "ON" even during complete power failure, providing continuous illumination for a safe means of egress. In emergency situations when most needed, you can rely on "ISOLITE."

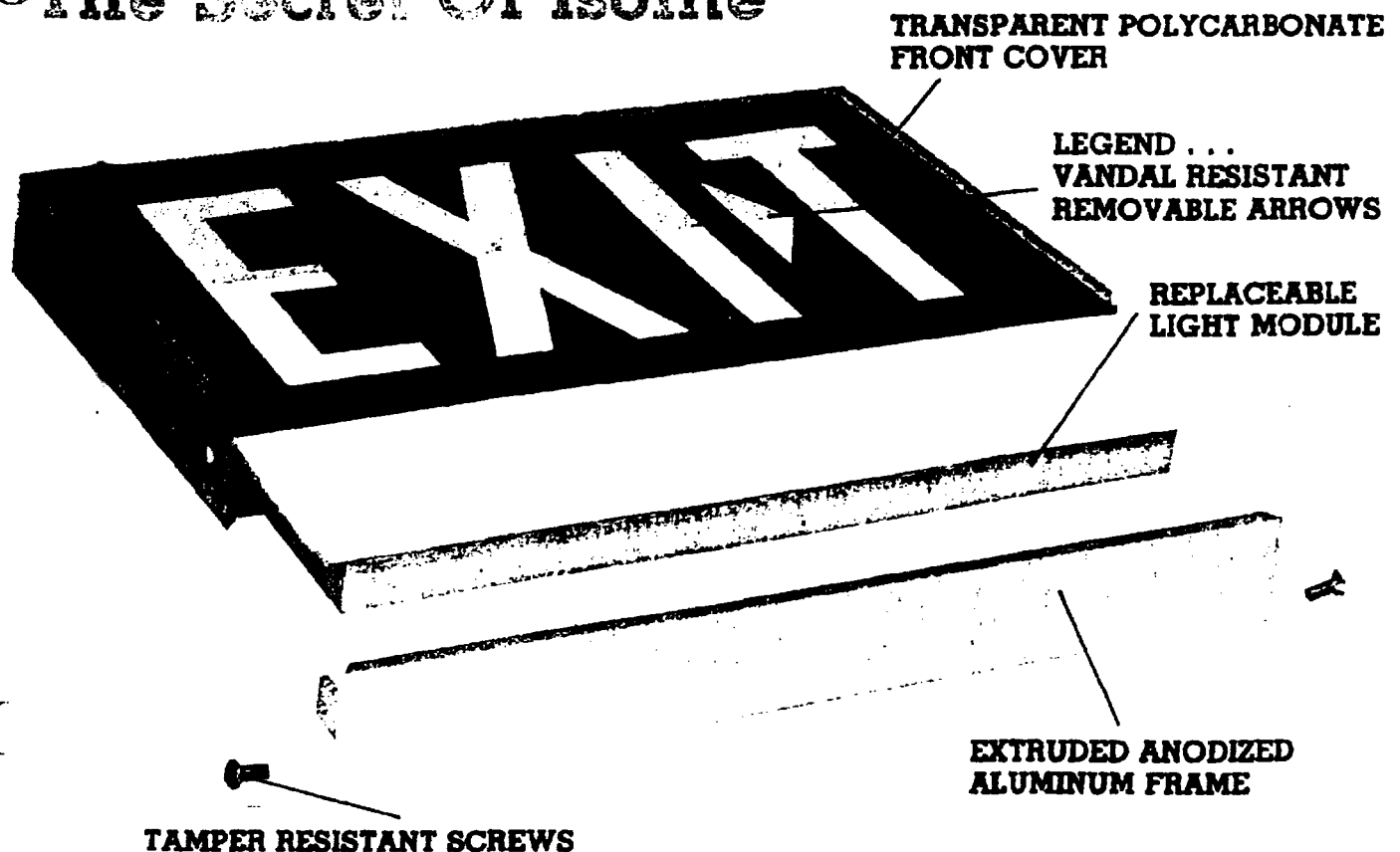
## Isolite Makes It Simple

**INITIAL INSTALLATION** - Because of ISOLITE'S nonelectric feature, installation is quick and easy on permanent or temporary structures. Simply remove popout arrow for required direction and attach sign to a wall or even glass using the mounting accessories listed in the order information section.

**REPLACEMENT** - At the end of ISOLITE'S useful life, simply remove the one piece module from the mounted fixture and insert a new replaceable module.

**MAINTENANCE** - Not only is installation and replacement simple, ISOLITE is maintenance free during its entire useful life. No batteries to check or bulbs to change, install it and rely on it.

## ○ The Secret Of Isolite



# Specifications

LETTERS:	6" high 3/4" Stroke — Standard Exit Sign
OVERALL SIGN SIZE:	Single Face: 12.75" x 8.25" x 1.50" Double Face: 12.75" x 8.25" x 2.69" (One Complete Unit)
SIGN CONSTRUCTION:	Cover: Transparent Polycarbonate - .060" thickness Frame: Extruded Aluminum - .053" minimum wall thickness Backplate: .050" Aluminum. Legend: .017 thick Vinyl. Color as required.
REPLACEABLE MODULE:	Cover: .125" thick acrylic and polycarbonate Backpan: .040" thick Aluminum Tubes: Tritium filled glass tube with internal phosphor coating
ARROWS:	Universal removable arrows. Tamper resistant that cannot be changed by other than manufacturer or installer.
LEGIBILITY:	125 feet
LIFE:	10 - 15 years

## Ordering Information

<b>SINGLE FACE EXIT SIGN - ANODIZED ALUMINUM FRAME</b> Sign (Includes Universal Removable Arrow Legend and surface mounting bracket)	2040-01
<b>DOUBLE FACE EXIT SIGN - ANODIZED ALUMINUM FRAME</b> (Bracket not included) Sign (Includes Universal Removable Arrow Legends)	2040-07
<b>ACCESSORIES - ALUMINUM FRAME SIGNS</b> Single Face End or Ceiling Mounting Bracket	2040-05
Double Face End or Ceiling Mounting Bracket (Canopy)	2040-10
Pendant Mounting Bracket (12" Rod Standard)	2040-15
<b>SINGLE FACE SIGN - BLACK PLASTIC FRAME</b> Sign (Includes Universal Removable Arrow Legend and surface mounting hardware)	2040-50
<b>DOUBLE FACE SIGN - BLACK PLASTIC FRAME</b> (Bracket not included) Sign (Includes Universal Removable Arrow Legends)	2040-60
<b>ACCESSORIES - BLACK PLASTIC FRAME SIGNS</b> Single Face End Mounting Bracket and Backplate	2040-51
Single Face Pendant Mounting Bracket and Backplate	2040-52
Single Face Ceiling Mounting Bracket and Backplate	2040-53
Double Face End Mounting Bracket	2040-61
Double Face Pendant Mounting Bracket	2040-62
Double Face Ceiling Mounting Bracket	2040-63

### LEGENDS

Red (Standard)  
Green — Add Suffix -G  
Black — Add Suffix -B

### FRAMES AND LEGENDS

Various colors  
available upon request.

Examples: Dual Language  
Safety Symbols



#### Manufacturer:

**Safety Light Corp.**  
4150-A Old Berwick Road  
Bloomsburg, PA 17815  
(717) 784-4344

#### Marketing:

**TriLuzco**  
110 W. Lancaster Ave.  
Wayne, PA 19087  
(215) 688-2800

#### Distributed by:

**J. R. CHILDRESS & SONS, INC.**  
191 BIRCHMOUNT AVE.  
PITTSBURGH, PENNSYLVANIA 15209



# SAFETY LIGHT CORPORATION

## MATERIAL SAFETY DATA SHEET

#1A

**PRODUCT NAME** - Self-Luminous Device ( $H^3$  gas-filled).  
(Distribution authorized pursuant to Section 32.51, 10 CFR Part 32)

### SECTION I

<b>MANUFACTURER'S NAME</b> Safety Light Corporation		<b>EMERGENCY TELEPHONE NO.</b> 717/784-4344
<b>ADDRESS (Number, Street, City, State, and ZIP Code)</b> 4150-A Old Berwick Rd., Bloomsburg, PA 17815		
<b>CHEMICAL NAME AND SYNONYMS</b> N/A		<b>TRADE NAME AND SYNONYMS</b> ISOLITE
<b>CHEMICAL FAMILY</b> N/A	<b>FORMULA</b> N/A	

### SECTION II - HAZARDOUS INGREDIENTS

PAINTS, PRESERVATIVES, & SOLVENTS	X	TLV (Unit)	ALLOYS AND METALLIC COATINGS	X	TLV (Unit)
PIGMENTS		N/A	BASE METAL		N/A
CATALYST		N/A	ALLOYS		N/A
VEHICLE		N/A	METALLIC COATINGS		N/A
SOLVENTS		N/A	FILLER METAL PLUS COATINGS OR CORE FLUX		N/A
ADDITIVES		N/A	OTHERS		N/A
OTHERS		N/A			

HAZARDOUS MIXTURES OF OTHER LIQUIDS, SOLIDS, OR GASES	X	TLV (Unit)
Radioactive gas (Tritium or $H^3$ ) contained in hermetically-sealed glass tube(s), enclosed in outer protective housing		$4 \times 10^{-5}$
*USNRC MPC in air for gaseous forms of $H^3$ in unrestricted areas = $4 \times 10^{-5}$ microCuries $H^3$ /mL air		

### SECTION III - PHYSICAL DATA

BOILING POINT (°F.)	N/A	SPECIFIC GRAVITY (4/4-3)	N/A
VAPOR PRESSURE (mm Hg.)	N/A	PERCENT VOLATILE BY VOLUME (%)	N/A
VAPOR DENSITY (AIR=1)	N/A	EVAPORATION RATE (_____ -1)	N/A
SOLUBILITY IN WATER	Insoluble		
<b>APPEARANCE AND ODOR</b> Hermetically-sealed, self-luminous tubes in protective housing; odorless			

### SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (Method used)	N/A	FLAMMABLE LIMITS	Lel	Uel
EXTINGUISHING MEDIA $CO_2$ or dry chemical - Avoid use of water.				
SPECIAL FIRE FIGHTING PROCEDURES Consult in advance: 1) Your Safety Officer, or 2) your regional USNRC office, or 3) your State-Radiological Health Dept.				
UNUSUAL FIRE AND EXPLOSION HAZARDS Avoid inhalation of air in immediate vicinity of fire				

## SECTION V - HEALTH HAZARD DATA

**THRESHOLD LIMIT VALUE**  
As H<sup>3</sup> gas:  $4 \times 10^{-5}$   $\mu\text{Ci H}^3/\text{mL air}$ ; as HTO:  $2 \times 10^{-7}$   $\mu\text{Ci H}^3/\text{mL air}$

**EFFECTS OF OVEREXPOSURE**  
Unknown

### EMERGENCY AND FIRST AID PROCEDURES

Consult: 1. Your Safety Officer

or 2. Your Regional USNRC Office

or 3. Your State Radiological Health Dept.

## SECTION VI - REACTIVITY DATA

STABILITY	UNSTABLE	N/A	CONDITIONS TO AVOID	N/A
	STABLE	XXX		
INCOMPATIBILITY (Reactions to avoid)		N/A		
HAZARDOUS DECOMPOSITION PRODUCTS		H <sup>3</sup> gas or HTO		
HAZARDOUS POLYMERIZATION	MAY OCCUR	N/A	CONDITIONS TO AVOID	N/A
	WILL NOT OCCUR	XXX		N/A

## SECTION VII - SPILL OR LEAK PROCEDURES

**STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED**  
Immediately Contact: 1. Your Safety Officer

or 2. Your Regional USNRC Office

or 3. Your State Radiological Health Dept.

### WASTE DISPOSAL METHOD

CONTACT: 1. Manufacturer -OR-

2. Low-level radwaste disposal broker

## SECTION VIII SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION (Specify type)		N/A	
VENTILATION	LOCAL EXHAUST	Normal	SPECIAL N/A
	MECHANICAL (General)	N/A	OTHER N/A
PROTECTIVE CLOVES		EYE PROTECTION	
N/A		N/A	
OTHER PROTECTIVE EQUIPMENT		N/A	

## SECTION IX - SPECIAL PRECAUTIONS

**PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE**  
N/A

### OTHER PRECAUTIONS

Do not disassemble or discard

PAGE 12)

The information above is believed to be accurate and represents the best information currently available to us. However, we make no warranty of merchantability or any other warranty, express or implied, with respect to such information, and we assume no liability resulting from its use. Users should make their own investigations to determine the suitability of the information for their particular purposes.

02/21/89

TO: Maintenance Supervisors

FROM: Fred Salter

SUBJECT: Isolite Exit Signs

Please check your plant exit signs to see if any Isolite Self-Luminous exit signs have been installed or sent to you by the O. E. group. These exit signs are covered under the U. S. Nuclear Regulatory Commission. They contain small amounts of Tritium gas and all exit signs of these type must be registered with Alabama's Public Health Department.

Please check your exit signs and sent to me this week, the number of isolite signs, the model numbers, and the amount of tritium (this is found on the back of the sign and is listed in curries).

If you have any questions please call me at ext. 2431.  
Thanks for your assistance in this matter.

Respectfully,

*Fred Salter*

Fred Salter  
Safety Engineer



**BUREAU OF RADIOLOGICAL HEALTH  
ALABAMA DEPARTMENT OF PUBLIC HEALTH  
Room 510, State Office Building  
Montgomery, Alabama 36130-1701**



**GENERAL LICENSE REGISTRATION FORM**

Firm Name \_\_\_\_\_ License No.\* \_\_\_\_\_

Mailing Address \_\_\_\_\_

Physical Address \_\_\_\_\_

Contact Person \_\_\_\_\_ Telephone No. \_\_\_\_\_

Type of Device \_\_\_\_\_

Manufacturer \_\_\_\_\_

Model Number \_\_\_\_\_ Isotope/Amount \_\_\_\_\_

Number of Devices \_\_\_\_\_ Date Received \_\_\_\_\_

Will the device be tested for leakage? ☐ Yes ☐ No

If yes, at what frequency? \_\_\_\_\_

The leak test will be performed by: \_\_\_\_\_

Please describe method of disposal (i.e. returned to manufacturer).

Is the device received on a contract basis? (i.e. where the device is returned to the manufacturer and a new device received after a specified length of time?) ☐ Yes ☐ No

If yes, what length of time is the device in your possession? \_\_\_\_\_ years \_\_\_\_\_ months

Signature \_\_\_\_\_

Date \_\_\_\_\_

Please return completed form to:

Bureau of Radiological Health  
Room 510, State Office Building  
Montgomery, Alabama 36130-1701

\*Assigned by this office

ADPH-F-RAD-78/Rev 12-85

420-3-26-.02(6)(d)4.(v)

- (v) Shall not export such depleted uranium except in accordance with a license issued by the U.S. Nuclear Regulatory Commission pursuant to 10 CFR Part 110. 2b/

5. Any person receiving, acquiring, possessing, using, or transferring depleted uranium pursuant to the general license established by 420-3-26-.02(6)(d)1. is exempt from the requirements of Rules 420-3-26-.03 and 420-3-26-.10 of these rules with respect to the depleted uranium covered by that general license.

(7) General Licenses - Radioactive Material Other than Source Material.

- (a) Certain Devices and Equipment. A general license is hereby issued to transfer, receive, acquire, own, possess, and use radioactive material incorporated in the following devices or equipment which have been manufactured, tested, and labeled by the manufacturer in accordance with a specific license issued to the manufacturer by the Agency, the U.S. Nuclear Regulatory Commission, or any Agreement State, and authorizing distribution under the general license of this paragraph or its equivalent. The general license provided in this paragraph (a) is subject to provisions of 420-3-26-.01(6) through 420-3-26-.01(11), 420-3-26-.02(4)(a)2., 420-3-26-.02(12), 420-3-26-.02(18), 420-3-26-.02(19), 420-3-26-.02(21), Rule 420-3-26-.03 and Rule 420-3-26-.10 3/ of these rules.

1. Static Elimination Device. Devices designed for use as static eliminators which contain, as a sealed source or sources, radioactive material consisting of a total of not more than five hundred (500) microcuries of polonium 210 per device or a total of not more than fifty (50) millicuries of hydrogen 3 (tritium) per device.

(b) Certain Measuring, Gauging, or Controlling Devices.

1. A general license is hereby issued to commercial and industrial firms and to research, educational, and medical institutions, individuals in the conduct of their business, and State or local government agencies to own, receive, acquire, possess, use, or transfer in accordance with the

2b/ Available from Superintendent of Documents, Government Printing Office, Washington, D.C. 20402. Cost of Parts 0-199 \$8.50.

3/ Attention is directed particularly to the provisions of Rule 420-3-26-.03 of these rules which relate to the labeling of containers.

420-3-26-.02(7)(b)2.

provisions of 420-3-26-.02(7)(b)2., 3., and 4., radioactive material, excluding special nuclear material, contained in devices designed and manufactured for the purpose of detecting, measuring, gauging or controlling thickness, density, level, interface location, radiation, leakage, or qualitative or quantitative chemical composition, or for producing light, or an ionizing atmosphere.

2. The general license in 420-3-26-.02(7)(b)1. applies only to radioactive material contained in devices which have been manufactured and labeled in accordance with the specifications contained in a specific license issued by the Agency pursuant to 420-3-26-.02(10)(f) or in accordance with the specifications contained in a specific license issued by the U.S. Nuclear Regulatory Commission, Licensing State, or an Agreement State.
3. Any person who owns, receives, acquires, possesses, uses, or transfers radioactive material in a device pursuant to the general license in 420-3-26-.02(7)(b)1.:
  - (i) shall assure that all labels, affixed to the device at the time of receipt, and bearing a statement that removal of the label is prohibited, are maintained thereon and shall comply with all instructions and precautions provided by such labels;
  - (ii) shall assure that the device is tested for leakage of radioactive material and proper operation of the on-off mechanism and indicator, if any, at no longer than six-month intervals or at such other intervals as are specified in the label, however,
    - (I) devices containing krypton only need not be tested for leakage of radioactive material, and
    - (II) devices containing tritium only or not more than 100 microcuries of other beta and/or gamma emitting material or 10 microcuries of alpha emitting material and devices held in storage in the original shipping container prior to initial installation need not be tested for any purpose;

- (iii) shall assure that the tests required by 420-3-26-.02(7)(b)3.(ii) and other testing installation, servicing, and removal from installation, involving the radioactive materials, its shielding or containment, are performed:
- (I) in accordance with the instructions provided by the labels, or
  - (II) by a person holding an applicable specific license from the Agency, Licensing State, the U.S. Nuclear Regulatory Commission, or an Agreement State to perform such activities;
- (iv) shall maintain records showing compliance with the requirements of 420-3-26-.02(7)(b)(ii) and (iii). The records shall show the results of tests. The records also shall show the dates of performances of, and the names of persons performing, testing, installation, servicing, and removal from installation concerning the radioactive material, its shielding or containment. Records of tests for leakage of radioactive material required by 420-3-26-.02(7)(b)3.(ii) shall be maintained for 1 year after the next required leak test is performed or until the sealed source is transferred or disposed. Records of tests of the on/off mechanism and indicator required by 420-3-26-.02(7)(b)3.(ii) shall be maintained for 1 year after the next required test of the on/off mechanism and indicator is performed or until the sealed source is transferred or disposed. Records which are required by 420-3-26-.02(7)(b)3.(iii) shall be maintained for a period of 2 years from the date of the recorded event or until the device is transferred or disposed;
- (v) upon the occurrence of a failure of or damage to, or any indication of a possible failure of or damage to, the shielding of the radioactive material or the on-off mechanism or indicator, or upon the detection of 0.005 microcurie or more removable radioactive material, shall immediately suspend operation of the device until it has been repaired by the manufacturer or other person holding an applicable specific license from the Agency, Licensing State, the U.S. Nuclear Regulatory Commission, or an Agreement State to repair such devices, or

420-3-26-.02(7)(b)3.(vi)

disposed of by transfer to a person authorized by an applicable specific license to receive the radioactive material contained in the device and, within 30 days, furnish to the Agency, Licensing State, a report containing a brief description of the event and the remedial action taken;

- (vi) shall not abandon the device containing radioactive material;
- (vii) except as provided in 420-3-26-.02(7)(b)3.(viii), shall transfer or dispose of the device containing radioactive material only by transfer to a specific licensee of the Agency, the U.S. Nuclear Regulatory Commission, Licensing State, or an Agreement State whose specific license authorizes him to receive the device and within 30 days after transfer of a device to a specific licensee shall furnish to the Agency a report containing identification of the device by manufacturer's name and model number and the name and address of the person receiving the device. No report is required if the device is transferred to the specific licensee in order to obtain a replacement device;
- (viii) shall transfer the device to another general licensee only:
  - (I) where the device remains in use at a particular location. In such case, the transferor shall give the transferee a copy of this regulation and any safety documents identified by the label on the device and within 30 days of the transfer, report to the Agency the manufacturer's name and model number of device transferred, the name and address of the transferee, and the name and/or position of an individual who may constitute a point of contact between the Agency and the transferee; or
  - (II) where the device is held in storage in the original shipping container at its intended location of use prior to initial use by a general licensee; and
- (ix) shall comply with the provisions of 420-3-26-.03 (23) and 420-3-26-.03(24) of these rules for reporting radiation incidents, theft, or loss of licensed material, but



shall be exempt from the other requirements of Rules 420-3-26-.03 and 420-3-26-.10 of these rules.

(x) shall within ten (10) days after the receipt of the device, notify the Agency of the type of device and the name and address of the supplier.

4. The general license in 420-3-26-.02(7)(b)1. does not authorize the manufacture of devices containing radioactive material.

5. The general license provided in 420-3-26-.02(7)(b)1. is subject to the provisions of 420-3-26-.01(6), 420-3-26-.01(7), 420-3-26-.01(8), 420-3-26-.01(10), 420-3-26-.01(11), 420-3-26-.01(12), 420-3-26-.02(12), 420-3-26-.02(18), 420-3-26-.02(19), and 420-3-26-.02(21) of these rules.

(c) Luminous Safety Devices for Aircraft.

1. A general license is hereby issued to own, receive, acquire, possess, and use tritium or promethium 147 contained in luminous safety devices for use in aircraft provided:

(i) each device contains not more than 10 curies of tritium or 300 millicuries of promethium 147; and

(ii) each device has been manufactured, assembled or imported in accordance with a specific license issued by the U.S. Nuclear Regulatory Commission or each device has been manufactured or assembled in accordance with the specifications contained in a specific license or equivalent licensing document issued by the Agency or any Agreement State to the manufacturer or assembler of such device pursuant to licensing requirements equivalent to those in Section 32.53 of 10 CFR Part 32.2b/ of the regulations of the U.S. Nuclear Regulatory Commission.

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2b/ Available from Superintendent of Documents, Government Printing Office, Washington, D.C. 20402. Cost of Parts 0-199 \$8.50.

2. Persons who own, receive, acquire, possess, or use luminous safety devices pursuant to the general license in subparagraph 1. of this paragraph are exempt from the requirements of Rule 420-3-26-.03 and 420-3-26-.10 except that they shall comply with the provisions of 420-3-26-.03(23) and 420-3-26-.03(24).
3. This general license does not authorize the manufacture, assembly or repair of luminous safety devices containing tritium or promethium 147.
4. This general license does not authorize the ownership, receipt, acquisition, possession or use of promethium 147 contained in instrument dials.
5. The general license provided in this paragraph is subject to the provisions of 420-3-26-.01(6), 420-3-26-.01(7), 420-3-26-.01(8), 420-3-26-.01(10), 420-3-26-.01(11), 420-3-26-.01(12), 420-3-26-.02(12), 420-3-26-02(18), 420-3-26-.02(21), and Rule 420-3-26-.10.



BUREAU OF RADIOLOGICAL HEALTH  
ALABAMA DEPARTMENT OF PUBLIC HEALTH  
Room 510, State Office Building  
Montgomery, Alabama 36130-1701



#1  
GENERAL LICENSE REGISTRATION FORM

Firm Name Vanity Fair Mills, Inc. License No.                     

Mailing Address 624 South Alabama Ave. Monroeville, AL 36462

Physical Address 2001 Blvd., Phenix, Alabama 36504 (Sewing Operation)

Contact Person Fred Salter/Bill Kirksey Telephone No. 205-575-3231  
205-568-2171

Type of Device Emergency Exit Sign

Manufacturer Safety Light Corporation

Model Number 2040 Isotope/Amount 6 with 8. curies  
1 with 15. curies  
1 with 40. curies

Number of Devices 3 Date Received 7/21/82 - 8/22/82

Will the device be tested for leakage? ☐ Yes ☒ No  
If yes, at what frequency? N/A

The leak test will be performed by: N/A

Please describe method of disposal (i.e. returned to manufacturer).  
Return to Manufacturer/other authorized method

Is the device received on a contract basis? (i.e. where the device is returned to the manufacturer and a new device received after a specified length of time?) ☐ Yes ☒ No

If yes, what length of time is the device in your possession?              years              months

Fred Salter  
Fred Salter Safety Engineer  
Signature Date 7/17/82

Please return completed form to

Bureau of Radiological Health  
Room 510, State Office Building  
Montgomery, Alabama 36130-1701

Serial #	model	Curious	Location P.T.I
A801245	2040	8	TRASH DUCK EXIT
D601014	2040	30	BREAK AREA EXIT
A801246	2040	8	RECUVING DUCK EXIT
A801243	2040	8	LOADING DUCK EXIT
A801242	2040	8	PRESS PACK EXIT
A801244	2040	8	PRESS PACK EMG. EXIT
A801238	2040	8	NORTH WEST EMG. EXIT
D601011	2040	15	NORTH EAST EMG. EXIT

ISOLITE EXIT SIGNS

PLANT / W.C. KIRKLEY  
 J. H. KIRKLEY



**BUREAU OF RADIOLOGICAL HEALTH**  
**ALABAMA DEPARTMENT OF PUBLIC HEALTH**  
Room 510, State Office Building  
Montgomery, Alabama 36130-1701



# GENERAL LICENSE REGISTRATION FORM

Firm Name Vanity Fair Mills, Inc. License No.                     

Mailing Address 624 South Alabama Ave. Monroeville, AL 36462

Physical Address 12-124 Road, Monroeville, Alabama (66-02) (Boxing Corporation)

Contact Person Fred Salter/James Jordan Telephone No. 205-575-3231  
205-575-4122

Type of Device Emergency Exit Sign

Manufacturer Safety Light Corporation

Model Number 2040 Isotope/Amount 1 with 3. curies  
1 with 15. curies  
1 with 30. curies

Number of Devices 3 Date Received 7/31/88 + 9/9/88

Will the device be tested for leakage? ☐ Yes ☒ No  
if yes, at what frequency? N/A

The leak test will be performed by: N/A

Please describe method of disposal (i.e. returned to manufacturer).

Return to Manufacturer/other authorized method

Is the device received on a contract basis? (i.e. where the device is returned to the manufacturer and a new device received after a specified length of time?) ☐ Yes ☒ No

If yes, what length of time is the device in your possession? \_\_\_\_\_ years \_\_\_\_\_ months

Fred Salter  
Fred Salter Safety Engineer

3/15/89

**Please return completed form to:**

Bureau of Radiological Health  
Room 510, State Office Building  
Montgomery, Alabama 36130-1701

Maint Plant ~~2~~ # 2

att. Fred Salter Plant 6

Subject: Exit Signs.

We have 3 Isolate Exit signs in plant  
2

model # 2040 all three have different  
curves one with 8. one with 15. one with 30 curve.

Maint. Forman.

James J. Jolan

2 OF 3

FOUND

#3

02/21/89

TO: Maintenance Supervisors

FROM: Fred Salter

SUBJECT: Isolite Exit Signs

Please check your plant exit signs to see if any Isolite Self-luminous exit signs have been installed or sent to you by the NRC group. These exit signs are covered under the U. S. Nuclear Regulatory Commission. They contain small amounts of Tritium gas and all exit signs of these type must be registered with Alabama's Public Health Department.

Please check your exit signs and sent to me this week, the number of isolite signs, the model numbers, and the amount of tritium found on the back of the sign and is listed in our test.

If you have any questions please call me at ext. 2431.  
Thanks for your assistance in this matter.

Respectfully,

*Fred Salter*

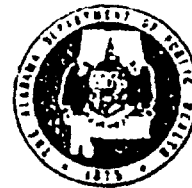
Fred Salter  
Safety Engineer

*Isolite  
Self-luminous exit signs in plant*

*[Handwritten signature]*



BUREAU OF RADIOLOGICAL HEALTH  
ALABAMA DEPARTMENT OF PUBLIC HEALTH  
Room 510, State Office Building  
Montgomery, Alabama 36130-1701



# 4

GENERAL LICENSE REGISTRATION FORM

Firm Name Vanity Fair Mills, Inc. License No.                       
Mailing Address 624 South Alabama Ave. Monroeville, AL 36462  
Physical Address Route 6444 Street, Metropolis, Alabama 36732 (Newing Corp)  
Contact Person Fred Salter/Dixie Mayton Telephone No. 205-575-3231  
205-389-0680  
Type of Device Emergency Exit Sign  
Manufacturer Safety Light Corporation  
Model Number 2040 Isotope/Amount 15. curies  
Number of Devices 2 Date Received                       
Will the device be tested for leakage? ☐ Yes ☒ No  
If yes, at what frequency? N/A  
The leak test will be performed by: N/A

Please describe method of disposal (i.e. returned to manufacturer).

Return to Manufacturer/other authorized method

Is the device received on a contract basis? (i.e. where the device is returned to the manufacturer and a new device received after a specified length of time?) ☐ Yes ☒ No

If yes, what length of time is the device in your possession?                      years                      months

Fred Salter  
Fred Salter Safety Engineer

Signature

Date

3/15/80

Please return completed form to:

Bureau of Radiological Health  
Room 510, State Office Building  
Montgomery, Alabama 36130-1701



02/21/89

TO: Maintenance Supervisors

FROM: Fred Salter

SUBJECT: Isolite Exit Signs

Please check your plant exit signs to see if any Isolite Self-Illuminous exit signs have been installed or sent to you by the U. S. group. These exit signs are covered under the U. S. Nuclear Regulatory Commission. They contain small amounts of Tritium gas and all exit signs of these type must be registered with Alabama's Public Health Department.

Please check your exit signs and sent to me this week, the number of Isolite signs, the model numbers, and the amount of tritium (this is found on the back of the sign and is listed in curies).

If you have any questions please call me at ext. 2431.  
Thanks for your assistance in this matter.

Respectfully,

*Fred Salter*

Fred Salter  
Safety Engineer

*331900*

*Model # 2040 15 Curies Tritium*  
*331900 DB01004*

*DB01004 = 15 Curies*

*DB01005 = 15 Curies*

*Good to go as requested*

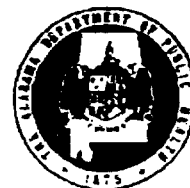
*Thank you*

*4*

*Y. M. Salter*



**BUREAU OF RADIOLOGICAL HEALTH**  
**ALABAMA DEPARTMENT OF PUBLIC HEALTH**  
Room 510, State Office Building  
Montgomery, Alabama 36130-1701



# GENERAL LICENSE REGISTRATION FORM

Firm Name Edwards, Inc. License No.                     

Mailing Address 400 North Lamar Ave. Knoxville, TN 37904

Physical Address Knoxville, Alabama Plant 6 (Dye/Finish Operation)

Contact Person Paul Walter/ Roy Bayler Telephone No. 625-875-3231

Type of Device Emergency Exit Sign

Manufacturer Safety Light Corporation

Model Number 1000 Isotope/Amount 15. curies Tritium

Number of Devices 2 Date Received 4/98

Will the device be tested for leakage? ☐ Yes ☒ No

If yes, at what frequency? N/A

The leak test will be performed by: N/A

Please describe method of disposal (i.e. returned to manufacturer).

Manufacturer/other authorized method

Is the device received on a contract basis? (i.e. where the device is returned to the manufacturer and a new device received after a specified length of time?) ☐ Yes ☒ No

If **yes**, what length of time is the device in your possession? \_\_\_\_\_ years \_\_\_\_\_ months

Fred Salter  
Chief Engineer

10/12/98  
Date

**Please return completed form to**  
**Director of Radiological Health**  
**Room 510, State Office Building**  
**Montgomery, Alabama 36130-1701**

FOUND 12



BUREAU OF RADIOLOGICAL HEALTH  
ALABAMA DEPARTMENT OF PUBLIC HEALTH  
Room 510, State Office Building  
Montgomery, Alabama 36130-1701



# GENERAL LICENSE REGISTRATION FORM

Firm Name Vanity Fair Mills, Inc. License No. 36462

Mailing Address 624 South Alabama Ave. Monroeville, AL 36462

Physical Address 2151 Palmer Street, Robertsdale, Alabama 36567 (Sewing Oper)

Contact Person Fred Salter/Junior Bennett Telephone No. 205-575-3231  
205-242-2980

Type of Device Emergency Exit Sign

Manufacturer Safety Light Corporation

Model Number 2040 Isotope/Amount 3 with 8. curies  
2 with 15. curies

Number of Devices 5 Date Received 1-25-77

Will the device be tested for leakage? ☐ Yes ☒ No

If yes, at what frequency? N/A

The leak test will be performed by: N/A

Please describe method of disposal (i.e. returned to manufacturer).

Return to Manufacturer/other authorized method

Is the device received on a contract basis? (i.e. where the device is returned to the manufacturer and a new device received after a specified length of time?) ☐ Yes ☒ No

If yes, what length of time is the device in your possession? \_\_\_\_\_ years \_\_\_\_\_ months

*Fred Salter*  
Fred Salter Safety Engineer

3/20/80  
Date

**Please return completed form to:**

Bureau of Radiological Health  
Room 510, State Office Building  
Montgomery, Alabama 36130-1701

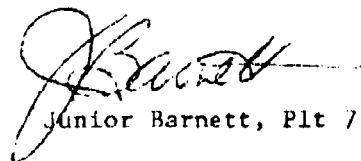
February 24, 1989

Fred Salter

SUBJECT: Isolite Exit Signs

I have five (5) Isolite Exit Signs in my plant. Listed below are the model numbers, serial numbers, and amount of curries. I could not tell for sure if the first character on 3 of the signs is a "Q" or an "A" and the third character is an "O" or an "E". They are scribed by hand.

	Model #	Serial #	Curries	Dated
1.	2040	Q8E1240	8	10/88
2.	2040	Q8E1239	8	10/88
3.	2040	D601009	15	10/86
4.	2040	D601008	15	10/86
5.	2040	Q8E1241	8	10/88

  
Junior Barnett, Plt 7